



Federal Communications Commission  
Washington, D.C. 20554

DA 07-4077

September 27, 2007

Robert W. Swanson  
1101 Wootton Parkway  
10th Floor  
Rockville, MD 20852

Re: Call Sign KB34  
File No. SES-STA-20070612-00794

Dear Mr. Swanson:

On June 12, 2007, Vizada Satellite, Inc. (Vizada)<sup>1</sup> filed the above-captioned request for Special Temporary Authority (STA) to allow its Santa Paula, CA earth station to communicate with the United Kingdom's Inmarsat 3F4 satellite at the 142° W.L. orbital location. On August 20, 2007, Vizada submitted a supplement to update its STA to clarify that it requests authority to operate a 10.4 meter earth station and transmit in the 6417.5–6456.7 MHz band and receive in the 3600.0–3631.5 MHz band. On August 30, 2007, Vizada filed a second supplement to indicate that the proposed feeder link will be used to provide both International and Domestic Service. On September 20, 2007, Vizada filed a third supplement containing a Schedule S for Inmarsat-3F4. For the reasons stated below, we dismiss the STA application as defective without prejudice to refiling.

Section 25.112 of the Commission's rules, 47 C.F.R. § 25.112, requires the Commission to return, as unacceptable for filing, any earth station application that is not substantially complete, contains internal inconsistencies, or does not substantially comply with the Commission's rules. Vizada's STA application contains several omissions and inconsistencies, and does not comply with the Commission's rules, rendering it subject to dismissal. These omissions and discrepancies are as follows:

(1) Footnote US245 of Section 2.106 of the Commission's rules, 47 C.F.R. § 2.106, states that non-Federal fixed-satellite service operations in the 3600-3650 MHz band are limited to international inter-continental operations. Vizada's August 30 supplement indicates its proposed feeder link for the Inmarsat 3F4 satellite will be providing, among other things, domestic GPS correction capability in the 3600-3650 MHz band. Vizada did not request a waiver of a Footnote US245 of Section 2.106 of the Commission's rules to permit the proposed domestic service in this band.

(2) In response to item S2 of Schedule S, Vizada indicates the frequency band limits for Inmarsat-3F4 are 6425-6454, 6454.4-6456.6, 3600-3629, and 3629.4-3631.6 MHz. This is inconsistent with the proposed earth station operating bands of 6417.5–6456.7 and 3600.0-3631.5 MHz. In addition, based on Vizada's response to item S9 of Schedule S, we calculate the band limits for channels CUR and CUL to be 6410.5-6468.5 MHz. This band is wider than the band

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<sup>1</sup> This application was initially filed by Telenor Satellite, Inc. Telenor Satellite, Inc. changed its name to Vizada Satellite, Inc.

limits listed in response to item S2 of Schedule S. Thus, we cannot determine the exact bands in which the earth station will operate.

(3) Vizada seeks to operate using a 1K65G2D emission designator. This proposed emission designator is inconsistent with the designators listed in the link budgets and S11 of Schedule S, which indicate that the emission designator used by the Inmarsat-3F4 satellite is classified as G1D.<sup>2</sup> Thus, we cannot determine which emission designator the earth station will use.

Further, while not a ground for dismissal, we request Vizada to provide, in any refiling, a case-by-case electromagnetic compatibility analysis to demonstrate its compatible operations, as indicated in Footnote US245 of Section 2.106 and Section 2.108 of the Commission's rules, 47 C.F.R. §§ 2.106 and 2.108.

Finally, pursuant to Section 25.111(a) of the Commission's rules, 47 C.F.R. § 25.111(a), in any refiling we request Vizada to certify that it has completed an EMC analysis according to US245 for its operations in the 3625-3700 MHz band, based on the NTIA TR-99-361 Report, *Technical Characteristics of Radiolocation Systems operating in the 3.1-3.7 GHz Band and Procedures for assessing EMC with Fixed Earth Station Receivers* (available at <http://www.ntia.doc.gov/osmhome/reports.html>), has determined the potential for unacceptable interference that may be caused to its receiving earth station, and agrees to accept such interference. Vizada should also certify that it is aware that use of a RF filter ahead of the low noise amplifier (LNA) would limit potential out-of-band interference to the receiving earth station.

Accordingly, pursuant to Section 25.112(a)(1) of the Commission's rules, 47 C.F.R. §25.112(a)(1), and Section 0.261 of the Commission's rules on delegations of authority, 47 C.F.R. §0.261, we dismiss the above-captioned application without prejudice to refiling.

Sincerely,

Scott A. Kotler  
Chief, Systems Analysis Branch  
Satellite Division  
International Bureau

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<sup>2</sup> According to Section 2.201 of the Commission's rules, the second symbol "1" of an emission denotes a single channel containing quantized or digital information *without* the use of a modulating sub-carrier, excluding time-division multiplex. The second symbol "2" of an emission denotes a single channel containing quantized or digital information *with* the use of a modulating sub-carrier, excluding time-division multiplex.